

Xavier R. Donaldson, Esq. (NY Bar Number 2713105)
Donaldson & Chilliest, LLP
1825 Park Ave., Suite 1102
New York, NY 10035
(212) 722-4900 ph
(212) 722-4966 fax
XDonaldson@AOL.com (e-mail)

*Michael S. Taylor, Esq. (CA. SBN 136814)
Attorney Seeking Pro Hac Vice Admission
Traylor Law Office, PC
8601 Lincoln Blvd. 180
Suite 525
Los Angeles, CA. 90045
(310) 401-6610 ph
(661) 480-1200 fax*

Attorneys for Specially Appearing Defendants Damon Dash, Raquel Horn and Poppington, LLC (wrongfully named as “Damon Dash Studios”)

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MONIQUE BUNN } Case No. 19-cv-11804 (JSR)
Plaintiff }
vs. } DECLARATION OF RAQUEL HORN IN
DAMON A. DASH, ET AL. } SUPPORT OF SPECIALLY APPEARING
Defendants. } DEFENDANTS' MOTION TO VACATE
DATE: APRIL 2, 2020
TIME: 3:00 P.M.
PLACE: COURTROOM 18C
JUDGE: HON. MARY K. VYSKOCIL

**DECLARATION OF RAQUEL HORN IN SUPPORT OF
SPECIALTY APPEARING DEFENDANTS' MOTION TO
VACATE DEFAULT, QUASH SERVICE AND DISMISS THE ACTION**

1

2 DECLARATION OF RAQUEL HORN

3 I, Raquel Horn, do hereby declare, affirm and testify as to the following in connection
4 with this matter:

5

6

7 1. Damon Dash is the Chief Executive Officer of Poppington, LLC., a limited
8 liability company with all of its current operations (and operations during the period
9 of April 2019. No formal entity exists, known to the undersigned, with the name of
10 Damon Dash Studios; however, Mr. Dash and Poppington refer to the moniker
11 “Damon Dash Studios” in a variety of media. Mr. Dash has resided solely in the State
12 of California for approximately eight (8) years.

13

14 2. I am the Managing Member of Poppington, LLC. and has resided solely in
15 the State of California for approximately eight (8) years.

16

17 3. I was not personally served with the pleadings in this manner, nor was
18 substituted service made upon either of them.

19

20 4. The address of 13547 Ventura Blvd, Suite 199, Sherman Oaks, CA. is not
21 the physical address for the office of Poppington, LLC. my residence or Mr. Dash’s
22 residence.

1 5. Also, during the time of November 23, 2019 – January 6, 2020, Mr. Dash
2 and Ms. Horn were traveling outside of the continental United States and had no
3 access to the unmonitored mailbox service referenced in the preceding paragraph.
4

5 The foregoing is true and correct and based upon my personal knowledge. If
6 called to testify, I would competently testify to the foregoing. I make this declaration
7 under penalty or perjury of the laws of the State of California, the State of New York
8 and the United States of America.

9
10
11 Dated this 3rd day of March, 2020 at Los Angeles, CA.

12
13
14 DocuSigned by:
15 
16 Raquel Horn
17 Declarant
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF RAQUEL HORN IN SUPPORT OF
SPECIALY APPEARING DEFENDANTS' MOTION TO
VACATE DEFAULT, QUASH SERVICE AND DISMISS THE ACTION